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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CELA

MEMORANDUM

TO: The Commission

FROM: Daniel A. Petalas
Acting General Counsel

Kathleen Guith
Acting Associate General Counsel for Enforcement

Stephen Gura
Deputy Associate General Counsel for Enforcement

BY: Mark Shonkwiler *MS*
Assistant General Counsel

Roy Q. Luckett *RQL*
Attorney

SUBJECT: MUR 6965 (Warriors for Liberty)
Pre-Probable Cause Conciliation Agreement

Attached is a conciliation agreement signed by Kieran Lalor in his official capacity as treasurer, on behalf of Warriors for Liberty and its treasurer (the "Committee") (See Attachment 1). We recommend the Commission accept this agreement to settle a violation of 52 U.S.C. § 30104(b) stemming from the Committee's failure to accurately disclose receipts, disbursements, and debts on its original 2013 Year-End Report. See Certification, MUR 6965 (Sept. 16, 2015) (finding reason to believe that the Committee violated 52 U.S.C. § 30104(b) and authorizing pre-probable cause conciliation).

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9 We believe that this agreement sufficiently vindicates the Commission's
10 enforcement interests under the circumstances presented in this matter. Therefore, we
11 recommend that the Commission accept the attached signed conciliation agreement and close the
12 file in this matter.
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14 **RECOMMENDATIONS:**

- 15
16 1. Accept the attached signed conciliation agreement with Warriors for Liberty and
17 Kieran Lalor in his official capacity as treasurer.
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19 2. Approve the appropriate letter.
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21 3. Close the file.
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